

C. REMARKS

1. Interview with Examiner on June 16, 2006

Applicant thanks the Examiner for the telephonic interview that took place on Friday June 16, 2006.

An Interview Summary that summarizes the discussions that took place during the telephonic interview has been filed with the U.S. Patent and Trademark Office by Applicant on Wednesday June 21, 2006.

2. Rejection of Claim 32 Under 35 U.S.C. § 102(b)

Claim 32 stands rejected under 35 U.S.C. § 102(b) as being anticipated by US Pat. No. 5,130,794 to Ritchey ("Ritchey"). As discussed during the telephonic interview, Applicant respectfully traverses for reasons set forth below.

Claim 32 requires, *inter alia*: "... a set of modular walls ..., at least one of the walls being a computer-controlled display; and "... a processing system ... configured to deliver to the display one or more images whose contents change based on the interaction between the individual and the environment"

Claim 32 thus requires that images be delivered to at least one modular wall that functions as a computer-controlled display and that these images vary based on the interaction between the individual and the environment. This limitation is lacking in Ritchey.

Ritchey does disclose delivering images to panel displays in Figure 32. However, Ritchey does not disclose changing those images based on the interaction between an individual and the environment.

Ritchey also discloses a different embodiment that updates images based on head movement. However, the images in this embodiment are delivered to a head mounted display, not to a modular wall.

The fact that one feature of the claim may be found in one apparatus and that another feature of the claim may be found in a COMPLETELY DIFFERENT apparatus does not constitute anticipation, even if both apparatuses are disclosed in the same document. This is particularly true here since the panels in Ritchey do not move with the individual as does the head mounted display. Indeed, it would be nonsensical to change the images that are displayed on the Ritchey's panels in response to head movement, as does Ritchey in connection with the head mounted display.

Ritchey does not teach updating images **on a modular wall** based on interaction between an individual and an environment, as required by the language of claim 32. Moreover, the Examiner has not contended otherwise in the Office Action.

For the reasons set forth above, Applicant submits that claim 32 is not anticipated by Ritchey under 35 U.S.C. 102 (b), and respectfully requests that the 102(b) rejection of claim 32 over Ritchey be withdrawn.

Applicant notes with appreciation that the Examiner agreed during the telephonic interview to withdraw her rejection of claim 32 under 35 U.S.C. 102(b) over Ritchey.

3. Rejection of Claims 1-20, and 29 Under 35 U.S.C. § 103(a)

Claims 1-20 and 29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over US Pat. No. 5,130,794 to Ritchey ("Ritchey") in view of U.S. Publication No. US 2003/0032484A1 to Ohshima et al. ("Ohshima"). Applicant respectfully traverses.

"To establish a *prima facie* case of obviousness, . . . the prior art references must teach or suggest all of the claim limitations." MPEP 2143. That is not the case here.

One key limitation in independent claim 1 is that the content of the images be "a function of . . . a plurality of displacement steps taken by the individual":

[A] processing system ... configured to deliver ... a sequence of images, the content of which are a function of ... a plurality of displacement steps taken by the individual within the structure.

Neither Ritchey nor Ohshima discloses a processing system that varies images as a function of a plurality of displacements steps taken by the individual. Indeed, not even the Examiner has stated otherwise.

Claim 1 (and all of the other claims which are dependent on claim 1, namely claims 2-20 and 29) are therefore not obvious under 35 U.S.C. 103 over Ritchey in view of Ohshima. ("If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious." MPEP 2143.03; In re Fine, 837 F.2d 1071, 2 USPQ2d 1596 (Fed. Cir. 1988)).

Claims 2-20 and 29 all depend on claim 1, and therefore include all the limitations of claim 1. Because amended independent claim 1 is nonobvious under 35 U.S.C. 103 over Ritchey in view of Oshlima, it follows that claims 2-20 and 29 (all depending from claim 1) are also nonobvious under 35 U.S.C. §103.

4. Rejection of Claims 21-28 under 35 U.S.C. 103 (a)

Claims 21-28 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Ritchey in view of Oshlima, and further in view of U.S. Pat. No. 5,086,385 to Launey et al. Applicant respectfully traverses.

Claims 21-28 all depend on claim 1, and therefore include all the limitations of claim 1.

For all the reasons discussed above (in section C-3), the combination of

Ritchey and Oshiiima fails to teach or suggest the limitation in claim 1. Launey fails to correct this deficiency.

Launey is directed to a home automation system, and does not relate to the interactive environment recited in claim 1. In particular, Launey does not teach or suggest a processing system configured to deliver a sequence of images to the display, the content of which are a function of the interaction between the individual and the scene, including a plurality of displacement steps taken by the individual within the structure that cooperates with the real object to form the scene within which the computer-controlled display is fixedly positioned.

Accordingly, the combination of Ritchey, Oshiiima, and Launey fails to teach or suggest at least the above-discussed limitation of claim 1.

Claims 21-28 all depend on claim 1, and therefore include all the limitations of claim 1. Accordingly, it follows that claims 21-28 are also not obvious under 35 U.S.C. §103 over Ritchey in view of Ohshima and further in view of Launey.

5. Invention Disclosure Statement

The Office Action pointed out that Applicant's information disclosure statement, filed on 04/01/2005, fails to comply with 37 CFR 1.98(a)(3), because English abstracts were not provided for the following references: DE10042982, DE10123849, FR2807527, DE19909936, DE19954885, EP1213686, FR2603815, JP2000187447, JP09-187573.

In respond, Applicant hereby encloses English abstracts for each of the references listed above. Because English abstracts have now been provided, Applicant submits that Applicant's information disclosure statement filed on 04/10/2005 now complies with 37 CFR 1.98(a)(3).

6. Conclusion

On the basis of the foregoing amendments, Applicant respectfully submits that all of the pending claims are in condition for allowance. An early and favorable action is therefore earnestly solicited.

Respectfully submitted,

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